



1 defendants herein, did knowingly combine, conspire, confederate, and agree together and  
2 with other persons known and unknown to the grand jury to commit an offense against  
3 the United States, that is, to knowingly and unlawfully ship, transport, receive, possess,  
4 and purchase contraband cigarettes, in violation of Title 18, United States Code, Section  
5 2342(a).

6 **WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY**

7 The primary purpose of the conspiracy was to make as much money as possible  
8 through the purchase and subsequent distribution of contraband cigarettes. The ways,  
9 manner, and means by which this purpose was carried out included the following:

10 1. It was part of the conspiracy that the defendants and their co-conspirators  
11 played different roles, took upon themselves different tasks, and participated in the  
12 affairs of the conspiracy through various criminal acts.

13 2. It was further part of the conspiracy that the defendants and their co-  
14 conspirators received for further distribution more than eight million cigarettes, none of  
15 which bore valid evidence of the payment of Nevada or local taxes.

16 4. It was further part of the conspiracy that the defendants and their co-  
17 conspirators traveled in interstate commerce in order to facilitate the purchase and  
18 distribution of contraband cigarettes.

19 5. It was further part of the conspiracy that the defendants and their co-  
20 conspirators distributed, and caused to be distributed, contraband cigarettes in various  
21 locations, including Nevada, California, and countries outside the United States.

22 6. It was further part of the conspiracy that the defendants and their co-  
23 conspirators derived money and other benefits from their unlawful activities.



1 \$20,000.

2 5. On or about October 31, 2014, defendant SUREN BABAYAN caused \$20,652  
3 cash to be deposited into an undercover bank account as partial payment in full for  
4 cigarettes purchased on October 23, 2014 and partial payment for future purchases of  
5 contraband cigarettes.

6 6. On or about November 4, 2014, defendant SUREN BABAYAN caused a total of  
7 \$15,000 cash to be deposited through two separate transactions, each less than \$10,000  
8 cash, into an undercover bank account.

9 7. On or about, November 5, 2014, defendant SUREN BABAYAN caused \$5,000  
10 cash to be deposited into an undercover bank account.

11 8. On or about November 14, 2014, in Las Vegas, Nevada, defendant SUREN  
12 BABAYAN received approximately 864,000 contraband cigarettes from undercover law  
13 enforcement officers for further distribution. The purchase price of the cigarettes was  
14 \$154,560.

15 9. On or about November 14, 2014 at about 8:40 a.m., defendant SUREN  
16 BABAYAN leased a U-Haul truck in Las Vegas, Nevada, returning the truck later that  
17 day at about 6:30 p.m. The truck was used to transport contraband cigarettes.

18 10. On or about November 16, 2014, defendant SUREN BABAYAN purchased ten  
19 \$1,000 MoneyGram International Money Orders totaling \$10,000.

20 11. On or about November 17, 2014, defendant SUREN BABAYAN purchased  
21 twenty \$1,000 MoneyGram International Money Orders totaling \$20,000.

22 12. On or about November 18, 2014, defendant SUREN BABAYAN purchased  
23 fourteen \$1,000 MoneyGram International Money Orders totaling \$14,000.

1       13. On or about November 19, 2014, defendant SUREN BABAYAN purchased  
2 nineteen MoneyGram International Money Orders totaling \$18,000.

3       14. On or about or about November 20, 2014, in Montebello, California, defendant  
4 ARSEN GRIGORYAN delivered approximately \$86,000 cash to a cooperating witness as  
5 partial payment for the cigarettes delivered on November 14, 2014.

6       15. On or about November 21, 2014, defendant SUREN BABAYAN purchased  
7 five MoneyGram International Money Orders totaling \$4,560.

8       16. On or about November 21, 2014, defendant SUREN BABAYAN mailed the 70  
9 previously purchased MoneyGram International Money Orders totaling \$68,560 to an  
10 undercover officer as final payment for the cigarettes delivered on November 14, 2014.  
11 The money orders were shipped via United States Postal Service Priority Mail Express  
12 package number EK594048578US.

13       17. On or about December 30, 2014, in Las Vegas, Nevada, defendant SUREN  
14 BABAYAN received approximately 816,000 contraband cigarettes from undercover law  
15 enforcement officers for further distribution. The purchase price of the cigarettes was  
16 \$148,980.

17       18. On or about December 30, 2014 at about 1:12 p.m., defendant SUREN  
18 BABAYAN leased a U-Haul truck in Las Vegas, Nevada, returning the truck later that  
19 day at about 5:43 p.m. The truck was used to transport contraband cigarettes.

20       19. On or about January 5, 2015, defendant SUREN BABAYAN deposited \$8,980  
21 cash into an undercover bank account as a down payment on a future purchase of  
22 cigarettes.

23       20. On or about January 9, 2015, in Las Vegas, Nevada defendant SUREN

1 BABAYAN and an unidentified co-conspirator delivered \$93,480 cash to a cooperating  
2 witness as partial payment for the cigarettes delivered received on December 30, 2014.

3 21. On or about January 28, 2015, in Las Vegas, Nevada, defendants SUREN  
4 BABAYAN and ARSEN GRIGORYAN delivered \$76,520 cash to two undercover agents,  
5 \$55,500 of which was in final payment for cigarettes delivered on December 30, 2014.  
6 The remaining \$21,020 was an advance payment for cigarettes to be delivered at a later  
7 date.

8 22. On or about January 30, 2015, in Las Vegas, Nevada, defendant SUREN  
9 BABAYAN received approximately 660,000 contraband cigarettes from undercover law  
10 enforcement officers. The purchase price of the cigarettes was \$122,100.

11 23. On or about February 4, 2015, defendant SUREN BABAYAN received  
12 approximately 30,000 California tax stamps at his business, Realty Edge, 6787 West  
13 Tropicana, Suite 271, Las Vegas, Nevada.

14 24. On or about February 17, 2015, defendant SUREN BABAYAN deposited  
15 \$9,000 cash into an undercover bank account as partial payment for the cigarettes  
16 delivered on January 30, 2015.

17 25. On or about February 18, 2015, defendant SUREN BABAYAN deposited  
18 \$9,000 cash into an undercover bank account as partial payment for the cigarettes  
19 delivered on January 30, 2015.

20 26. On or about February 19, 2015, defendant SUREN BABAYAN deposited  
21 \$9,500 cash into an undercover bank account as partial payment for the cigarettes  
22 delivered on January 30, 2015.

23 27. On or about February 25, 2015, defendant SUREN BABAYAN deposited

1 \$9,500 cash into an undercover bank account as partial payment for the cigarettes  
2 delivered on January 30, 2015.

3 28. On or about March 4, 2015, defendant SUREN BABAYAN deposited \$9,500  
4 cash into an undercover bank account as partial payment for the cigarettes delivered on  
5 January 30, 2015.

6 29. On or about March 5, 2015, defendant SUREN BABAYAN deposited \$9,800  
7 cash into an undercover bank account as partial payment for the cigarettes delivered on  
8 January 30, 2015.

9 30. On or about March 6, 2015, defendant SUREN BABAYAN deposited \$9,800  
10 cash into an undercover bank account as partial payment for the cigarettes delivered on  
11 January 30, 2015.

12 31. On or about March 9, 2015, defendant SUREN BABAYAN deposited \$9,500  
13 cash into an undercover bank account as partial payment for the cigarettes delivered on  
14 January 30, 2015.

15 32. On or about March 10, 2015, defendant SUREN BABAYAN deposited \$9,900  
16 cash into an undercover bank account as partial payment for the cigarettes delivered on  
17 January 30, 2015.

18 33. On or about March 11, 2015, defendant SUREN BABAYAN deposited \$6,600  
19 cash into an undercover bank account as partial payment for the cigarettes delivered on  
20 January 30, 2015.

21 34. Between March 9, 2015 and March 16, 2015, in Las Vegas, Nevada, defendant  
22 SUREN BABAYAN received approximately 972,000 contraband cigarettes from  
23 undercover law enforcement officers. The purchase price of the cigarettes was \$173,400.

1       35. On or about March 9, 2015 at about 12:54 p.m., defendant SUREN BABAYAN  
2 leased a U-Haul truck in Las Vegas, Nevada, returning the truck later that day at about  
3 2:55 p.m. The truck was used to transport contraband cigarettes.

4       36. On or about March 16, 2015 at about 11:28 a.m., defendant SUREN BABAYAN  
5 leased a U-Haul truck in Las Vegas, Nevada, returning the truck later that day at about  
6 2:52 p.m. The truck was used to transport contraband cigarettes.

7       37. On March 31, 2015, in Las Vegas, Nevada, a known associate of defendant  
8 SUREN BABAYAN delivered \$173,400 cash to a cooperating witness as full payment for  
9 the cigarettes purchased between March 10 and March 16, 2015.

10       38. On or about April 22, 2015, in Las Vegas, Nevada, defendant SUREN  
11 BABAYAN received approximately 900,000 contraband cigarettes from undercover law  
12 enforcement officers.

13       39. On or about April 22, 2015 at about 4:40 p.m., defendant SUREN BABAYAN  
14 leased a U-Haul truck in Las Vegas, Nevada, returning the truck the following day at  
15 about 11:15 a.m. The truck was used to transport contraband cigarettes.

16       40. On or about May 6, 2015, defendant SUREN BABAYAN deposited \$20,000  
17 cash into an undercover bank account as partial payment for the cigarettes delivered on  
18 April 22, 2015.

19       41. On or about May 11, 2015, defendant SUREN BABAYAN deposited \$20,000  
20 cash, in two separate \$10,000 transactions, into an undercover bank account as partial  
21 payment for the cigarettes delivered on April 22, 2015.

22       42. On or about May 12, 2015, defendant Suren Babayan received approximately  
23 258,000 contraband cigarettes from undercover law enforcement officers. The delivery of



1 the cigarettes took place at the Old Dominion Freight Terminal in Las Vegas, Nevada.

2 43. On or about May 27, 2014, defendant Suren Babayan received approximately  
3 600,000 contraband cigarettes from undercover law enforcement officers. The delivery of  
4 the cigarettes took place at the Old Dominion Freight Terminal in Las Vegas, Nevada.

5 44. On or about May 27, 2014, defendant Suren Babayan paid approximately  
6 \$195,540 cash to a cooperating witness as partial payment for these cigarettes and final  
7 payment for cigarettes previously received.

8 45. On or about May 27, 2014, after receiving 600,000 contraband cigarettes,  
9 defendant SUREN BABAYAN transported the contraband cigarettes to Best Storage,  
10 6960 West Robindale Road, Las Vegas, Nevada and placed them into Unit 1103 in  
11 Building A. That storage unit had been rented by defendant ARSEN GRIGORYAN on  
12 February 4, 2015.

13 46. On or about May 28, 2014, defendant Suren Babayan paid approximately  
14 \$59,950 cash to a cooperating witness as partial payment for these cigarettes.

15 47. On or about July 8, 2015, defendant Suren Babayan received approximately  
16 420,000 contraband cigarettes from undercover law enforcement officers. The delivery of  
17 the cigarettes took place at the Old Dominion Freight Terminal in Las Vegas, Nevada.

18 All in violation of Title 18, United States Code, Section 371.

19  
20 **COUNT TWO**  
(Trafficking in Contraband Cigarettes)

21 On or about October 23, 2014, in the State and Federal District of Nevada,

22 **SUREN BABAYAN,**

23 defendant herein did knowingly and unlawfully ship, transport, receive, possess, and

1 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,  
2 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
3 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
4 Title 18, United States Code, Section 2342(a).

5 **COUNT THREE**

6 (Trafficking in Contraband Cigarettes)

7 On or about November 14, 2014, in the State and Federal District of Nevada,

8 **SUREN BABAYAN,**

9 defendant herein did knowingly and unlawfully ship, transport, receive, possess, and  
10 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,  
11 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
12 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
13 Title 18, United States Code, Section 2342(a).

14 **COUNT FOUR**

15 (Trafficking in Contraband Cigarettes)

16 On or about December 30, 2014, in the State and Federal District of Nevada,

17 **SUREN BABAYAN,**

18 defendant herein did knowingly and unlawfully ship, transport, receive, possess, and  
19 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,  
20 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
21 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
22 Title 18, United States Code, Section 2342(a).  
23

**COUNT FIVE**  
(Trafficking in Contraband Cigarettes)

On or about January 30, 2015, 2014, in the State and Federal District of Nevada,

**SUREN BABAYAN,**

defendant herein did knowingly and unlawfully ship, transport, receive, possess, and purchase contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of the payment of applicable State cigarette taxes in the State of Nevada, in violation of Title 18, United States Code, Section 2342(a).

**COUNT SIX**  
(Trafficking in Contraband Cigarettes)

From on or about March 9, 2015, through March 16, 2015 in the State and Federal District of Nevada,

**SUREN BABAYAN,**

defendant herein did knowingly and unlawfully ship, transport, receive, possess, and purchase contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of the payment of applicable State cigarette taxes in the State of Nevada, in violation of Title 18, United States Code, Section 2342(a).

**COUNT SEVEN**  
(Trafficking in Contraband Cigarettes)

On or about April 22, 2015, in the State and Federal District of Nevada,

**SUREN BABAYAN,**

defendant herein did knowingly and unlawfully ship, transport, receive, possess, and purchase contraband cigarettes, as that term is defined in Title 18, United States Code,

1 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
2 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
3 Title 18, United States Code, Section 2342(a).

4 **COUNT EIGHT**

(Trafficking in Contraband Cigarettes)

5 On or about May 12, 2015, in the State and Federal District of Nevada,

6 **SUREN BABAYAN,**

7 defendant herein did knowingly and unlawfully ship, transport, receive, possess, and  
8 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,  
9 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
10 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
11 Title 18, United States Code, Section 2342(a).

12 **COUNT NINE**

(Trafficking in Contraband Cigarettes)

13 On or about May 27, 2015, in the State and Federal District of Nevada,

14 **SUREN BABAYAN,**

15 defendant herein did knowingly and unlawfully ship, transport, receive, possess, and  
16 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,  
17 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of  
18 the payment of applicable State cigarette taxes in the State of Nevada, in violation of  
19 Title 18, United States Code, Section 2342(a).

20 **COUNT TEN**

(Money Laundering)

21 On or about November 16, 2014, in the State and Federal District of Nevada,

22 **SUREN BABAYAN**  
23

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of ten \$1000 MoneyGram money orders as shown below

Serial #	Time	Street Address	City	Location
20485749181	13:00	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749182	13:00	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749183	13:03	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749184	13:03	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749185	13:24	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749186	13:24	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118309	19:07	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118310	19:07	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118313	19:16	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118314	19:17	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit: trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

**COUNT ELEVEN**  
(Money Laundering)

On or about November 17, 2014, in the State and Federal District of Nevada,

**SUREN BABAYAN**

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of twenty \$1000 MoneyGram money orders as shown

below

Serial #	Time	Address	City	Location
20485749215	13:28	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749216	13:28	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577592822	13:56	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592823	13:57	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118333	15:56	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118334	15:56	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749222	16:35	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749223	16:36	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749227	19:34	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749228	19:34	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118355	20:10	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118356	20:12	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20577592837	20:19	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592838	20:19	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592839	20:22	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592840	20:22	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118357	20:56	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118358	20:56	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118359	20:59	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118360	20:59	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit: trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

**COUNT TWELVE**  
(Money Laundering)

On or about November 18, 2014, in the State and Federal District of Nevada,

**SUREN BABAYAN**

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of sixteen \$1000 MoneyGram money orders as shown below

Serial #	Time	Street Address	City	Location
20584668006	08:51	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20584668007	08:51	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20485749240	10:52	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749241	10:53	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577593353	11:34	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593354	11:34	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118383	12:38	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118384	12:39	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118400	16:14	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118401	16:14	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749249	16:41	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749250	16:41	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749254	20:25	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749255	20:26	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749256	20:27	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749257	20:28	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in



the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

**COUNT THIRTEEN**  
(Money Laundering)

On or about November 19, 2014, in the State and Federal District of Nevada,

**SUREN BABAYAN**

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of sixteen \$1000 MoneyGram money orders as shown below

Serial #	Time	Amount	Street Address	City	Location
20584668030	08:45	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20584668031	08:45	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20586135630	10:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20586135631	10:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118422	13:15	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118423	13:15	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118425	13:36	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118426	13:36	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749269	13:38	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749270	13:39	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749271	13:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749272	13:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577593385	18:30	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593386	18:30	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593387	18:30	\$900	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118438	19:19	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118439	19:19	\$600	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118440	19:21	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118441	19:21	\$500	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:



1 trafficking in contraband cigarettes; and

2 (2) knowing that the transactions were designed in whole or part to avoid a reporting  
3 requirement under Federal law,

4 and that while conducting such financial transactions knew that the property involved in  
5 the financial transactions represented the proceeds of some form of unlawful activity.

6 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

7 **COUNTS FOURTEEN – TWENTY-TWO**  
8 (Money Laundering)

9 On or about the dates listed below, in the State and Federal District of Nevada,

10 **SUREN BABAYAN**

11 defendant herein, did knowingly conduct financial transactions affecting interstate  
12 commerce, to wit cash deposits into JP Morgan Chase Bank account xxxxx1575 as shown  
13 below

Count	Date	Amount
Fourteen	February 17, 2015	\$9,000
Fifteen	February 18, 2015	\$9,000
Sixteen	February 19, 2015	\$9,500
Seventeen	February 25, 2015	\$9,500
Eighteen	March 4, 2015	\$9,500
Nineteen	March 5, 2015	\$9,800
Twenty	March 6, 2015	\$9,800
Twenty-one	March 9, 2015	\$9,500
Twenty-two	March 10, 2015	\$9,900

19 which involved the proceeds of a specified unlawful activity, that is trafficking in  
20 contraband cigarettes in violation of 18 U.S.C. § 2342(a),

21 (1) with the intent to promote the carrying on of specified unlawful activity, to wit:

22 trafficking in contraband cigarettes; and

23 (2) knowing that the transactions were designed in whole or part to avoid a reporting

1 requirement under Federal law,  
2 and that while conducting such financial transactions knew that the property involved in  
3 the financial transactions represented the proceeds of some form of unlawful activity.

4 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

5  
6 DATED: This 20<sup>th</sup> day of October, 2015

7 A TRUE BILL:

8  
9 /S/  
10 FOREPERSON OF THE GRAND JURY

11 DANIEL G. BOGDEN  
12 United States Attorney

13   
14 ROBERTA A. KNIEF  
15 Assistant United States Attorney  
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